

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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FRIENDS OF GEORGE'S, INC.

PLAINTIFF,

v.

STEVEN J. MULROY, *in his individual  
and official capacity as District Attorney  
General of Shelby County, Tennessee,*

DEFENDANT

)  
) **Case No. 2:23-cv-02163-TLP-tmp**  
)  
)  
)

) **COMPLAINT FOR VIOLATIONS OF**  
) **THE CIVIL RIGHTS ACT OF 1871, 42**  
) **U.S.C. § 1983**  
)  
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**DECLARATION OF JACOB WEBSTER BROWN**

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I respectfully declare the following in lieu of affidavit under 28 U.S.C. § 1746:

1. I am a member of the bar in good standing and counsel of record in this matter for the prevailing Plaintiff, Friends of George's.

2. The "JWB" time entries on the attached statement of fees accurately reflect the number of hours (46.7) I spent on various aspects of this case, each of which were directly related to proving the Adult Entertainment Act (2023 Tenn. Pub. Acts, ch. 2 (codified at Tenn. Code Ann. §§ 7-51-1401, and -1407)) is unconstitutional.

3. The billing rate of \$385 per hour accurately reflects the amount I would normally charge for performing legal work of the same sort.

EXHIBIT B

I affirm under penalty of perjury that the foregoing statements are true and accurate to the best of my knowledge and information.

Executed June 21, 2023 in Memphis, Tennessee.



JACOB WEBSTER BROWN

**FRIEND'S OF GEORGE'S TIMESHEET: JWB \$385/hour**

4/20/2023	1.75 Researching case law on Federal Rule on Civil Procedure 5.1 and 24
4/21/2023	1.2 Reviewing discovery propounded by the State in preparation to file objections, responses, and requests for clarifications
5/4/2023	1.5 Reviewing and revising proposed Joint Pre-Trial Order
5/5/2023	3.5 Reviewing
5/5/2023	3.5 Reviewing and revising Plaintiff's Response in Opposition to Dismiss and Plaintiff's Reply to Trial Brief
5/13/2023	2.3 Reviewing Discovery materials, transcript of deposition, and beginning outline of direct examination
5/18/2023	1 Office conference with SKM re direct examination
5/20/2023	3.5 Preparing for Direct Examination, discussing standing with SKM and JS
5/21/2023	1 Preparing clips of FOG skits for exhibits
5/21/2023	3.5 Revising Direct Examination outline (Rodley) with SKM
5/22/2023	10.25 Attending trial and post trial debrief
5/22/2023	9.5 Attending trial day 1 and debriefing
5/23/2023	1.8 Attending trial day 2
5/24/2023	1.6 Reviewing transcript in preparation for drafting of findings of fact
5/25/2023	0.8 Reviewing trial transcript in preparation for drafting findings of fact
	46.7